

United States District Court

NORTHERN DISTRICT OF

UNITED STATES OF AMERICA

V.

COMPLAINT

CHRISTOPHER STEPHENS

CASE NUMBER: 3:13-MJ- 313 -BN

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about March 25, 2013, in Dallas County, in the Northern District of Texas, defendant(s),

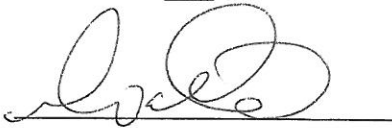
through the use of the mail, willfully made a threat, or maliciously conveyed false information knowing the same to be false, concerning an attempt or alleged attempt being made, to unlawfully damage or destroy a building, that is a federal courthouse, by means of an explosive,

in violation of Title 18, United States Code, Section(s) 844(e).

I further state that I am a(n) Special Agent with the Federal Bureau of Investigation (FBI) and that this complaint is based on the following facts:

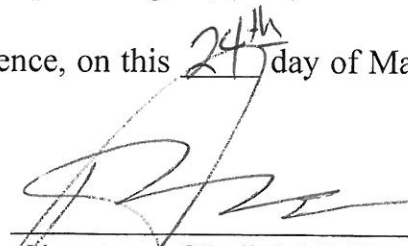
See attached Affidavit of Special Agent Marcus Watson, (FBI) which is incorporated and made a part hereof by reference.

Continued on the attached sheet and made a part hereof: XX Yes No


Signature of Complainant
Marcus Watson
Special Agent, (FBI)

Sworn to before me and subscribed in my presence, on this 24th day of May, 2013, at Dallas, Texas.

DAVID L. HORAN
UNITED STATES MAGISTRATE JUDGE
Name & Title of Judicial Officer


Signature of Judicial Officer

**AFFIDAVIT OF
Special Agent Marcus Watson
Federal Bureau of Investigation
(FBI)**

I, Marcus Watson, being duly sworn, depose and state that: I am a Special Agent (SA) of the Federal Bureau of Investigation (FBI) assigned to the Dallas Field Division and I have been employed as a Special Agent since 2010. Prior to becoming an FBI Agent, I worked for the public affairs department of Caterpillar, in Peoria, IL. Since becoming an FBI Agent in 2010, I have been assigned to the Joint Terrorism Task Force, and have investigated both International and Domestic Terrorism-related activities.

The information contained in this affidavit is based on my personal knowledge and experience, and information provided by other federal and state law enforcement officers. This affidavit is being submitted for the purpose of securing an arrest warrant for Christopher Stephens. I have set forth facts that I believe are necessary to establish probable cause that Christopher Stephens has violated 18 U.S.C. § 844 (e).

Factual Background

On March 5, 2013, Wichita Falls Police Department (WFPD) communications center received a telephone call in which an unidentified individual threatened to blow up the United States Federal Courthouse located in Dallas, Texas. The caller expressed hatred towards the United States Government and identified himself as "Gerald Adams." The call was audio recorded.

The FBI identified a J. Adams, date of birth of XX/XX, 1975, with a home residence in Wichita Falls, Texas, as a potential match. Research showed J. Adams to be confined to the North Texas State Hospital (NTSH) in Wichita Falls, Texas.

On March 6, 2013, the WFPD 9-1-1 communications center received a second telephone call from an individual claiming to be "Gerald Adams." The individual again threatened to blow up the United States Federal Courthouse in Dallas, Texas. The communications operator called the FBI and was instructed by Special Agent (SA) Fernando Benavides to ask the caller if he was located at the NTSH. The communications operator informed SA Benavides that the caller answered in the affirmative. The call was audio recorded.

Contact was made with J. Adams at the NTSH. After interviewing Adams, it was determined he was not the individual who made the telephonic bomb threats.

Adams stated that he believed the caller was an individual at the NTSH by the name of Christopher Stephens. Adams explained that during his stay, his ex-wife visited on numerous occasions. Stephens became fascinated by his ex-wife and eluded to making contact with her upon release. Adams believes Stephens used his name to sabotage his release date. Adams has interacted and had several conversations with Stephens. He describes Stephens as a sane individual who has extremely violent tendencies. Adams told SA Benavides that Stephens made it well known that he hates the United States

Government and has directly heard Stephens make violent threats towards patients at the NTSB.

Contact was made with Christopher Stephens, DOB September XX, 1979. Stephens was informed of the agent's identity and purpose of the visit. Stephens became very agitated and demanded the agent's identification. The agent complied with the request and attempted to start an interview. Stephens told the agent, if the FBI had probable cause he would be arrested, then dared the agent to arrest him. He stated that the FBI had no proof that implicated him to any bomb threats. He became noticeably upset because he was not provided a *Miranda* warning. Stephens was informed that he was not under arrest and the interview was to corroborate information. Stephens advised he would only answer questions if he was provided *Miranda* warning. SA Benavides determined that the voice making the bomb threats was Stephens. A verbal *Miranda* warning was provided to Stephens. He was asked if he understood all of the rights which had been explained to him. Stephens verbally answered in the affirmative. He stated he had no involvement in the bomb threats. SA Benavides produced a copy of the bomb threat recording and played it for Stephens. Stephens informed the agent he did not want to make any comments and invoked his right to counsel. No questions were asked of Stephens.

On March 7, 2013, the WFPD communications operator informed the FBI that Stephens was telephonically making a third bomb threat. Stephens advised that a bomb had been planted at the United States Courthouse in Fort Worth, Texas. He was upset at

President Obama and his healthcare plan. The operator kept Stephens on the telephone and dispatched WFPD officers to the NTSB. Upon arrival, officers observed Stephens on the phone actively speaking to WFPD dispatch. Stephens did not deny making the bomb threat. Staff informed the officers they overheard Stephens talking about "pushing a button" and that people were going to die. The call was also audio recorded.

Christopher Stephens was released to hospital staff. Prior to the officers' departure from the hospital, they were provided letters from Stephens. The letters were addressed to Officer J. Chesar #633 of the WFPD and the FBI. Officer Chesar opened the letter which provided a detailed description of how Stephens would blow up a federal courthouse, what materials he used to make the bomb and how it would detonate. Additionally, Stephens wrote "No Nigger Nation," "Wash my hand in nigger blood the white man marches on." Stephens depicted Nazi SS symbols and signed the letter.

SA Benavides, who was in telephonic contact with the officers, instructed them to open the letter addressed to the FBI. The letter conveyed the exact message that was included in the letter addressed to WFPD Officer J. Chesar.

SA Benavides met with officers and collected both letters. No further contact was made with Stephens since he had previously invoked his right to counsel.


On March 25, 2013, the FBI Field Division located at One Justice Way in Dallas, Texas, which is in the Dallas Division of the Northern District of Texas, received a letter from Christopher Stephens. The letter had been sent via the mail – United States Postal

Service – and was addressed to “Agent Steven M. Stokes.” (The letter had been postmarked March 22, 2013, by the United States Postal Service.) The letter read, "I will blow up the Federal Courthouse in Fort Worth, Texas." The letter was collected and entered into evidence. The letter was signed by Stephens.

On April 3, 2013, the WFPD informed the FBI that they received a mailed bomb threat from Christopher Stephens. The letter was addresses to Officer J. Chesar. SA Benavides asked Officer J. Chesar to enter the letter into the WFPD evidence room. The letter mirrored the received letter by the FBI in Dallas, Texas, with the exception of the depiction of three Nazi Swastikas and the word “White Power”. The letter was signed by Stephens.

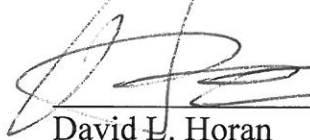
Accordingly, there is probable cause to believe that on or about March 25, 2013, in the Dallas Division of the Northern District of Texas, Christopher Stephens, through the use of the mail, willfully made a threat, and maliciously conveyed false information knowing the same to be false, concerning an attempt or alleged attempt being made, to unlawfully damage or destroy a building, that is a federal courthouse, by means of an explosive. This is a violation of 18 U.S.C. § 844(e).

[NO FURTHER INFORMATION ON THIS PAGE]



Marcus Watson
FBI Special Agent

Subscribed and sworn to before me on this 24th day of May, 2013.



David L. Horan
United States Magistrate Judge
Northern District Of Texas